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Of Counsel

January 28, 2020

Hon. Kiyo A. Matsumoto  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *United States v. Donville Inniss*, Docket No. 18-Cr.-134 (KAM)**

Dear Judge Matsumoto:

Defense counsel respectfully requests a three week extension of time to file a Rule 29 motion on behalf of the defendant, Donville Inniss, by Thursday, February 20, 2020.

Presently, the defense's Rule 29 motion is due on Thursday, January 30, 2020, however, since the verdict in this case, I was required to devote my attention to a most urgent matter in a death-authorized case in the Southern District of New York, in which I serve as learned counsel. Moreover, I am presently preparing for trial in the matter of *United States v. Carlos Richard Martinez*, Docket No. 17-cr-281 (ERK), which was most recently scheduled for jury selection to take place on Monday, February 10, 2020.

Defense counsel has discussed this application with the government, which has no objection; however, due to the present schedules and obligations of the government prosecutors in this case, the government requests a period of three weeks to file its

response, which would be Thursday, March 12, 2020. Finally, defense counsel requests one additional week to file an optional reply, if necessary, which would be Thursday, March 19, 2020.

Respectfully,

*Anthony L. Ricco*

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cc: A.U.S.A. Sylvia Shweder (By E.C.F.)  
cc: A.U.S.A. David Gopstein (By E.C.F.)  
cc: Gerald M. Moody, Jr. (By E.C.F.)  
United States Department of Justice  
Trial Attorney